



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105-3901

September 21, 2020

Sent by email to: [sswigart@spartanchemical.com](mailto:sswigart@spartanchemical.com)

Cc: [mshoun@spartanchemical.com](mailto:mshoun@spartanchemical.com); [bschalitz@spartanchemical.com](mailto:bschalitz@spartanchemical.com); [aswinford@spartanchemical.com](mailto:aswinford@spartanchemical.com)

Steve Swigart, CEO  
Spartan Chemical Company, Inc.  
1110 Spartan Drive  
Maumee, OH 43537

**Re: Request for Information Under Section 8(b) of the Federal Insecticide, Fungicide, and Rodenticide Act, 7 U.S.C. § 136f(b)**

Dear Mr. Swigart:

On behalf of the United States Environmental Protection Agency, Region IX ("EPA"), I request **Spartan Chemical Company, Inc.** submit the information specified below to EPA as part of an investigation to determine The GEO Group, Inc.'s ("GEO Group") compliance with the Federal Insecticide, Fungicide, and Rodenticide Act ("FIFRA"), 7 U.S.C. §§136 et. seq. at the Adelanto ICE Processing Center, located at 10400 Rancho Rd. and 10250 Rancho Rd., Adelanto, California 92301. EPA is looking into GEO Group's use of disinfectants and sanitizers at the Adelanto ICE Processing Center within the past year, particularly its use of HDQ Neutral. This Request is made pursuant to FIFRA inspection authority at Section 8(b) of FIFRA, 7 U.S.C. § 136f(b), which provides, in relevant part, that "any producer, distributor, carrier, dealer, or any other person who sells or offers for sale, delivers or offers for delivery any pesticide or device shall, upon request of any officer or employee of the EPA duly designated by the Administrator, furnish or permit such person at all reasonable times to have access to and copy: (1) all records showing the delivery, movement or holding of the pesticide or device, including the quantity, the date of shipment and receipt, and the name of the consignor and consignee; or (2) in the event of the inability of the person to produce records containing such information, all other records and information relating to such delivery, movement, or holding of the pesticide or device. Any inspection with respect to any records and information referred to in this subsection shall not extend to financial data, sales data other than shipment data, pricing data, personnel data; and research data." See also 40 C.F.R. §169.3. I am duly designated to request this information as an EPA Inspector with a FIFRA Credential.

Accordingly, please provide the following records/documents:

1. Purchase orders, sales invoices, or shipping records for all disinfectants or sanitizers sold to GEO Group's Adelanto ICE Processing Center in the past 1 year.

2. Copies of labels, supplemental labels, and user-prepared labels of all disinfectants and sanitizers sold to the Adelanto ICE Processing Center in the past 1 year.
3. A copy of the label, supplemental labels, and user-prepared labels for Clean by Peroxy.
4. A copy of the most recent contract between GEO Group and Spartan Chemical Company.
5. Records for all inspections of the dilution/dispensing equipment installed at the Adelanto ICE Processing Center conducted in the past 1 year. Be sure to include reports for all monthly service calls and quarterly comprehensive audits in this time period.
6. Records showing the findings of any investigations by Spartan Chemical Company into allegations that detainees, staff, or volunteer workers at the Adelanto ICE Processing Center were made ill due to the use of HDQ Neutral or other disinfectants/sanitizers sold by Spartan Chemical Company in the past 1 year.
7. Records showing training provided to Adelanto ICE Processing Center staff or detainees in the past 1 year.
8. Copies of training materials used for training at Adelanto ICE Processing Center in the past 1 year.

As stated above, this request does not apply to financial, pricing, or personnel data but rather the shipping and receiving information associated with sales. Therefore, you may redact any pricing information. Furthermore, you may be entitled to assert a claim of business confidentiality covering any part or all of information requested. If you believe that any of the information qualifies as Confidential Business Information, please inform me before submitting the information to allow us to institute appropriate Agency procedures for transmitting this information.

Within ten (10) business days of receipt of this Request, please submit a PDF copy of the records/documents that are responsive to this Request to [hyles.timothy@epa.gov](mailto:hyles.timothy@epa.gov), with a Cc to [Salazar.Matt@epa.gov](mailto:Salazar.Matt@epa.gov), along with a signed PDF copy of the accompanying Statement of Authorization. For each PDF copy of a document produced in response to this Request, indicate on such copy or in some other reasonable manner, the Request item number to which it responds. You may also include a narrative statement to accompany the responsive records/documents. Similarly, if any portion or all of the narrative pertains to a specific Request item, please indicate the Request item number to which it corresponds.

Please know that federal law at 18 U.S.C. § 1001 authorizes criminal fines and/or imprisonment for knowingly or willfully providing false information to the United States Government. In addition, failure to submit the requested information within the time period specified above may subject your company to a physical inspection by EPA and/or the State of California, as allowed by law.

Thank you in advance for your prompt attention to this Request. If you have any questions or need additional time to respond to this Request, please contact me at [hyles.timothy@epa.gov](mailto:hyles.timothy@epa.gov) or (415) 972-3801, or Matt Salazar at [Salazar.Matt@epa.gov](mailto:Salazar.Matt@epa.gov) or (415) 972-3982.

Sincerely,

Timothy Hyles  
Inspector  
Toxics Branch  
Enforcement and Compliance Assurance Division

Enclosure:  
Statement of Authorization

## STATEMENT OF AUTHORITY TO ACT AS AUTHORIZED REPRESENTATIVE

I, \_\_\_\_\_ (the undersigned), acknowledge receipt of the foregoing Request for Information and certify that:

I am an Authorized Representative of Spartan Chemical Company, Inc.

Attached hereto are \_\_\_\_\_ pages of PDF copies of documents or records. The attached pages are true and correct copies of documents or records that I presently have in my custody and/or control as an owner, officer and/or employee of Spartan Chemical Company.  
the physical address of which is \_\_\_\_\_.

I am one of the custodians of the records of which the attached pages are true and correct copies. Those documents that have been requested by EPA are being produced along with this Statement in response to the Request.

The records (of which the attached pages are true copies) involved here were and/or are received and/or kept in the normal course of regularly conducted business and activity of Spartan Chemical Company.

I have made a diligent search and inquiry for all records which are reasonably described in the Request to which this Statement responds. I have not found or located, and I have not been told about, and I have no knowledge of, any documents or records falling within the descriptions set forth in the Request that have not been copied and submitted along with this Statement.

All responses to the inquiries contained in the Request are true, complete and accurate. I acknowledge that this Statement is submitted to the United States in connection with a matter within the jurisdiction of EPA and that any materially false statement of fact herein may be a federal crime under 18 U.S.C. § 1001.

Date: \_\_\_\_\_

Signature: \_\_\_\_\_

Type or Print Name: \_\_\_\_\_

Title: \_\_\_\_\_

Spartan Chemical Company, Inc.